

Exhibit 11

APPENDIX APPLE-859: APPLE's INFRINGEMENT OF U.S. PATENT NO. 6,963,859

SECTION 1: Apple Accused Products—iTunes Videos

Claim 1	Apple Accused Products (iTunes Videos)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content, said rendering system comprising:	<p>Apple's Accused Instrumentalities that support the iTunes application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities") Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).¹</p> <p>Specifically, each of these Apple Accused Instrumentalities configured to activate the iTunes application ("iTunes App"), which is available on any Device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

¹ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>TV Shows. Tune in to your favorites anytime—and anywhere—you want.</p> <p>iTunes brings you more than 250,000 TV shows commercial-free² — many in 1080p HD.³ Buy individual episodes or a full season. With Season Pass, you can even buy a full season before it airs. And with Complete My Season, you can buy an episode or two to check out a show, then get the whole season for the original price minus what you've already paid. Whether you buy on your Mac, PC, or iOS device, TV shows are instantly accessible in your iTunes library, where you can play them or download a copy to take with you. Perfect for when you're traveling and won't have Wi-Fi.</p> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>
	<p>https://www.apple.com/itunes/features/</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device	Each of the Apple Accused Instrumentalities configures a rendering device configured to render the

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Claim 1	Apple Accused Products (iTunes Videos)
configured to render the content; and	<p>content.</p> <p>For example, the Apple Accused Instrumentalities is configured to render the video which is rented or purchased from iTunes Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <hr/> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p>

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Claim 1	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>	
<p>a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to the rendering device and including a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iTunes Videos app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be</p>	

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Claim 1	Apple Accused Products (iTunes Videos) signed using a digital certificate. The digital certificate is checked during installation and update of iTunes Videos App. Upon information and belief, if the certificate is not present the installation/update fails.
	<div style="border: 1px solid black; padding: 10px;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce communication integrity.</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p> <div data-bbox="686 416 1784 726" style="border: 1px solid black; padding: 10px;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p data-bbox="559 775 1446 807">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="623 840 1848 1387" style="border: 1px solid black; padding: 10px;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce physical integrity. For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<h2 data-bbox="834 241 1431 376">Encryption and Data Protection</h2> <p data-bbox="834 512 1634 719">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> <h3 data-bbox="834 773 1178 801">Hardware Security Features</h3> <p data-bbox="834 817 1628 904">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> <p data-bbox="834 920 1613 1037">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> <p data-bbox="834 1054 1645 1323">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> <p data-bbox="559 1367 1453 1395">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>USE OF PURCHASED OR RENTED CONTENT</p> <p>You agree that the iTunes Service and certain iTunes Products include security technology that limits your use of iTunes Products and that, whether or not iTunes Products are limited by security technology, you shall use iTunes Products in compliance with the applicable usage rules established by Apple and its licensors ("Usage Rules"), and that any other use of the iTunes Products may constitute a copyright infringement. Any security technology is an inseparable part of the iTunes Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the iTunes Service by any means other than through software that is provided by Apple for accessing the iTunes Service. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the iTunes Service. Violations of system or network security may result in civil or criminal liability.</p> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p>For example, when the user attempts to use any of the Apple Accused Instrumentalities to download a rented or purchased video, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iTunes Store) for access to the content.</p> <p>Further, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and plays the video according to the usage rights associated with the video.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>Download past purchases Languages English</p> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> <p>Before you begin</p> <ol style="list-style-type: none">1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item.2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. <p>http://support.apple.com/kb/HT2519</p> <div data-bbox="650 845 1820 1292"><p>Movies, TV shows, or music videos</p><ol style="list-style-type: none">1. Tap Settings > Videos and make sure Show All Videos is on.2. Tap the Videos app.3. Tap Movies, Music Videos, or TV Shows at the bottom of the page.<div data-bbox="764 1057 1241 1134"></div><ol style="list-style-type: none">4. Find the item that you want to download.5. Tap the Download  icon.</div> <p>http://support.apple.com/kb/HT2519</p>

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Claim 1	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p> <div data-bbox="620 943 1848 1387" style="border: 1px solid black; padding: 10px;"> <p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div>	

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Claim 1	Apple Accused Products (iTunes Videos) http://support.apple.com/kb/HT1304
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 1	<p>Apple Accused Products (iTunes Videos)</p> <p>http://www.apple.com/itunes/features/</p> <p>To rent movies from the iTunes Store on your computer</p> <ol style="list-style-type: none">1. In iTunes on your computer, click iTunes Store.2. In the iTunes Store, find a movie you want to rent.3. Click Rent. Your rental should begin to download immediately. <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> <ol style="list-style-type: none">1. Connect the device and select it in iTunes.2. Click the Movies button.3. Select the movie, and then click Move.4. After all movies have been moved, click Apply in the lower-right corner of iTunes. <p>You must be connected to the Internet to transfer a rented movie.</p> <p>http://support.apple.com/kb/HT1390</p>
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U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 1	Apple Accused Products (iTunes Videos)
<p>the requester mode of operation is operative to request access to content from another distributed repository, and</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a purchased or rented video (by tapping on the download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iTunes Store) for access to the content.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> </div> <p>http://support.apple.com/kb/HT1491</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>To rent movies from the iTunes Store on your computer</p> <ol style="list-style-type: none"> 1. In iTunes on your computer, click iTunes Store. 2. In the iTunes Store, find a movie you want to rent. 3. Click Rent. Your rental should begin to download immediately. <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> <ol style="list-style-type: none"> 1. Connect the device and select it in iTunes. 2. Click the Movies button. 3. Select the movie, and then click Move. 4. After all movies have been moved, click Apply in the lower-right corner of iTunes. <p>You must be connected to the Internet to transfer a rented movie.</p> <p>http://support.apple.com/kb/HT1390</p> <p>Download past purchases Languages <input type="button" value="English"/></p> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> <p>Before you begin</p> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country.

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Claim 1	Apple Accused Products (iTunes Videos) http://support.apple.com/kb/HT2519
	<p>Movies, TV shows, or music videos</p> <ol style="list-style-type: none"> 1. Tap Settings > Videos and make sure Show All Videos is on. 2. Tap the Videos app. 3. Tap Movies, Music Videos, or TV Shows at the bottom of the page. <div data-bbox="762 507 1248 584" style="border: 1px solid black; width: 230px; height: 47px; margin: 10px auto; position: relative;">  </div> <ol style="list-style-type: none"> 4. Find the item that you want to download. 5. Tap the Download  icon. <p>http://support.apple.com/kb/HT2519</p>
<p>said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="623 563 1848 1019" style="border: 1px solid black; padding: 10px;"><p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p><p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p><p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p></div> <p data-bbox="561 1052 1043 1085">http://support.apple.com/kb/HT1304</p>

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Claim 1	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 3	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 5	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 3 wherein said means for storing comprises means for storing content after rendering.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user downloads a purchased or rented video ((by tapping on the download icon displayed on the Apple Accused Instrumentality), it gets downloaded and is stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). On information and belief, user can view the video unlimited number of times within the 'Rental period' in case of rented videos and for purchased videos within the time period till iTunes is entitled to provide the video to its users.</p> <p>Further, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and</p>

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Claim 5	Apple Accused Products (iTunes Videos)
	<p>supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div data-bbox="629 518 1854 975" style="border: 1px solid black; padding: 10px;"><p>Browsing and buying videos</p><p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p><p>Watching videos</p><p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p><p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p></div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 5	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 5	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 8	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 5 wherein the content comprises video.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content comprising video.</p> <p>For example, the content provided by the iTunes store are videos for rent/ purchase which can be rendered on the Apple Accused Instrumentalities.</p> <div data-bbox="925 556 1537 1148" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p>http://www.apple.com/itunes/features/</p>

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Claim 8	Apple Accused Products (iTunes Videos)
	<p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> <hr/> <p>http://support.apple.com/kb/HT1491</p>

Claim 13	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein said rendering device comprises a video system.	<p>Each of the Apple Accused Instrumentalities comprises a rendering device that comprises a video system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a rendering device that can play (render) movies and TV shows and thus comprise a video system.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

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Claim 13	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>	

<http://www.apple.com/itunes/features/>

Videos

You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:

- When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads.
- If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue.
- With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer.

Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more [about rentals](#).

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Claim 13	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1491

Claim 15	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iTunes App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered (e.g., executed) on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permits the rendering of the video within the</p>

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Claim 16	<p>Apple Accused Products (iTunes Videos)</p>
	<p>expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p style="text-align: center;">http://support.apple.com/kb/HT1304</p>

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Claim 16	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 16	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 19	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be displayed on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the displaying of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the displaying accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not displayed on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 19	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 19	<p>Apple Accused Products (iTunes Videos)</p> <p>http://www.apple.com/itunes/features/</p>
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p>

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Claim 19	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE
Claim 20	<p>Apple Accused Products (iTunes Videos)</p> <p>A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.</p> <p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be played on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the playing of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the playing accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not played on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 20	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 20	<p>Apple Accused Products (iTunes Videos)</p> <p>http://www.apple.com/itunes/features/</p>
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p>

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Claim 20	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE

Claim 21	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.	<p>On information and belief, the Apple Accused Instrumentalities comprise a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 24	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
<p>A computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:</p>	<p>Apple's Accused Instrumentalities that support the iTunes application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities") Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content.(See below).²</p> <p>Specifically, each of these Apple Accused Instrumentalities configured to activate the iTunes application ("iTunes App"), which is available on any Device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

² These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>TV Shows. Tune in to your favorites anytime—and anywhere—you want.</p> <p>iTunes brings you more than 250,000 TV shows commercial-free² — many in 1080p HD.³ Buy individual episodes or a full season. With Season Pass, you can even buy a full season before it airs. And with Complete My Season, you can buy an episode or two to check out a show, then get the whole season for the original price minus what you've already paid. Whether you buy on your Mac, PC, or iOS device, TV shows are instantly accessible in your iTunes library, where you can play them or download a copy to take with you. Perfect for when you're traveling and won't have Wi-Fi.</p> <p>Movies.</p> <p>Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>
	<p>https://www.apple.com/itunes/features/</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
configuring a rendering	Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the

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Claim 58	Apple Accused Products (iTunes Videos)
device to render the content;	<p>content.</p> <p>For example, the Apple Accused Instrumentalities is configured to render the video which is rented or purchased from iTunes Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <hr/> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p>

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Claim 58	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>	
<p>configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to the rendering device and configured to include a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iTunes Videos app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be</p>	

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Claim 58	<p>Apple Accused Products (iTunes Videos)</p>
	<p>signed using a digital certificate. The digital certificate is checked during installation and update of iTunes Videos App. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="692 376 1769 1188" style="border: 1px solid black; padding: 10px;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce communication integrity.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p> <div data-bbox="686 416 1784 726" style="border: 1px solid black; padding: 10px;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p data-bbox="559 775 1446 807">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="612 840 1848 1387" style="border: 1px solid black; padding: 10px;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce physical integrity. For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<h2 data-bbox="834 241 1431 376">Encryption and Data Protection</h2> <p data-bbox="834 512 1634 719">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> <h3 data-bbox="834 773 1178 801">Hardware Security Features</h3> <p data-bbox="834 817 1628 904">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> <p data-bbox="834 920 1613 1037">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> <p data-bbox="834 1054 1645 1323">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> <p data-bbox="559 1367 1453 1395">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>USE OF PURCHASED OR RENTED CONTENT</p> <p>You agree that the iTunes Service and certain iTunes Products include security technology that limits your use of iTunes Products and that, whether or not iTunes Products are limited by security technology, you shall use iTunes Products in compliance with the applicable usage rules established by Apple and its licensors ("Usage Rules"), and that any other use of the iTunes Products may constitute a copyright infringement. Any security technology is an inseparable part of the iTunes Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the iTunes Service by any means other than through software that is provided by Apple for accessing the iTunes Service. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the iTunes Service. Violations of system or network security may result in civil or criminal liability.</p> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p>For example, when the user attempts to use any of the Apple Accused Instrumentalities to download a rented or purchased video, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iTunes Store) for access to the content.</p> <p>Further, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and plays the video according to the usage rights associated with the video.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>Download past purchases Languages English</p> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> <p>Before you begin</p> <ol style="list-style-type: none">1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item.2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. <p>http://support.apple.com/kb/HT2519</p> <div data-bbox="650 845 1820 1292"><p>Movies, TV shows, or music videos</p><ol style="list-style-type: none">1. Tap Settings > Videos and make sure Show All Videos is on.2. Tap the Videos app.3. Tap Movies, Music Videos, or TV Shows at the bottom of the page.<div data-bbox="764 1057 1241 1134"></div><ol style="list-style-type: none">4. Find the item that you want to download.5. Tap the Download  icon.</div> <p>http://support.apple.com/kb/HT2519</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p> <div data-bbox="623 971 1848 1411" style="border: 1px solid black; padding: 10px;"> <p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
<p>enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;</p>	<p>http://support.apple.com/kb/HT1304</p> <p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos) http://www.apple.com/itunes/features/ To rent movies from the iTunes Store on your computer <ol style="list-style-type: none">1. In iTunes on your computer, click iTunes Store.2. In the iTunes Store, find a movie you want to rent.3. Click Rent. Your rental should begin to download immediately. <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> <ol style="list-style-type: none">1. Connect the device and select it in iTunes.2. Click the Movies button.3. Select the movie, and then click Move.4. After all movies have been moved, click Apply in the lower-right corner of iTunes. <p>You must be connected to the Internet to transfer a rented movie.</p> http://support.apple.com/kb/HT1390
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Claim 58	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 58	Apple Accused Products (iTunes Videos)
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a purchased or rented video (by tapping on the download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iTunes Store) for access to the content.</p> <hr/> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> <hr/> <p>http://support.apple.com/kb/HT1491</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>To rent movies from the iTunes Store on your computer</p> <ol style="list-style-type: none"> 1. In iTunes on your computer, click iTunes Store. 2. In the iTunes Store, find a movie you want to rent. 3. Click Rent. Your rental should begin to download immediately. <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> <ol style="list-style-type: none"> 1. Connect the device and select it in iTunes. 2. Click the Movies button. 3. Select the movie, and then click Move. 4. After all movies have been moved, click Apply in the lower-right corner of iTunes. <p>You must be connected to the Internet to transfer a rented movie.</p> <p>http://support.apple.com/kb/HT1390</p> <p>Download past purchases</p> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> <p>Before you begin</p> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country.

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Claim 58	<p>Apple Accused Products (iTunes Videos)</p> <p>http://support.apple.com/kb/HT2519</p>
<p>receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="623 563 1848 1019" style="border: 1px solid black; padding: 10px;"><p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p><p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p><p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p></div> <p data-bbox="561 1052 1043 1085">http://support.apple.com/kb/HT1304</p>

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Claim 58	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 58	Apple Accused Products (iTunes Videos)

Claim 60	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 62	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user downloads a purchased or rented video ((by tapping on the download icon displayed on the Apple Accused Instrumentality), it gets downloaded and is stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). User can view the video unlimited number of times within the 'Rental period' in case of rented videos and on information and belief, for purchased videos within the time period till which iTunes is entitled to provide the video to its</p>

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Claim 62	Apple Accused Products (iTunes Videos)
	<p>users.</p> <p>Further, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p style="text-align: center;">http://support.apple.com/kb/HT1304</p> </div>

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Claim 62	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 62	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 65	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 62, wherein the content comprises video.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content comprising video.</p> <p>For example, the content provided by the iTunes Store are videos for rent/ purchase which can be rendered on the Apple Accused Instrumentalities.</p> <div data-bbox="925 556 1537 1148" style="border: 1px solid black; padding: 10px;"><p>Movies. Now showing on all your screens.</p><p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p></div> <p data-bbox="566 1188 1058 1220">http://www.apple.com/itunes/features/</p>

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Claim 65	Apple Accused Products (iTunes Videos)
	<p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> <hr/> <p>http://support.apple.com/kb/HT1491</p>
Claim 69	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said rendering device comprises a video system.	<p>Each of the Apple Accused Instrumentalities comprises a rendering device that comprises a video system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a rendering device that can play (render) movies and TV shows and thus comprise a video system.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

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Claim 69	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>	

<http://www.apple.com/itunes/features/>

Videos

You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:

- When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads.
- If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue.
- With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer.

Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more [about rentals](#).

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Claim 69	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1491

Claim 71	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iTunes App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 72	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered (e.g., executed) on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permits the rendering of the video within the</p>

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Claim 72	<p>Apple Accused Products (iTunes Videos)</p>
	<p>expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Browsing and buying videos To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 72	Apple Accused Products (iTunes Videos)	
	<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> <p>http://www.apple.com/itunes/features/</p>	

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Claim 72	Apple Accused Products (iTunes Videos)
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>Languages English</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p>

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Claim 75	Apple Accused Products (iTunes Videos)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be displayed on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the displaying of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the displaying accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not displayed on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 75	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 75	<p>Apple Accused Products (iTunes Videos)</p> <p>http://www.apple.com/itunes/features/</p>
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p>

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Claim 75	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE

Claim 76	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be played on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the playing of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the playing accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not played on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 76	Apple Accused Products (iTunes Videos)
	<p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> <p>http://support.apple.com/kb/HT1304</p> <div data-bbox="925 796 1543 1372" style="border: 1px solid black; padding: 10px;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 76	<p>Apple Accused Products (iTunes Videos)</p> <p>http://www.apple.com/itunes/features/</p>
	<p>iTunes Store: Movie rental usage rights in the United States</p> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p>The iTunes Store movie rental usage rules are as follows:</p> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. <p>http://support.apple.com/kb/ht1415</p> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p>

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Claim 76	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE

Claim 81	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

SECTION 2: Apple Accused Products – iBooks

Claim 1	Apple Accused Products (iBooks)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative	Apple's Accused Instrumentalities that support the iBooks application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below). ³

³ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

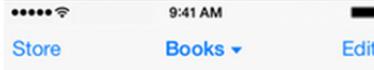
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
to rendering content in accordance with usage rights associated with the content, said rendering system comprising:	<p>For example, each of these Apple Accused Instrumentalities configured to activate the iBooks Application (“iBooks App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p> <div data-bbox="566 388 777 425" style="border: 1px solid black; padding: 5px;">Description</div> <p>iBooks is an amazing way to download and read books. iBooks includes the iBooks Store, where you can download the latest best-selling books or your favourite classics — day or night. Browse your library on a beautiful bookshelf, tap a book to open it, flip through pages with a swipe or a tap, and bookmark or add notes to your favourite passages.</p> <p>Download books</p> <ul style="list-style-type: none"> • Download best-sellers and classic books from the iBooks Store • Find fully illustrated books, including children's picture books, designed art books, photo books, cook books and more in the iBooks Store • Experience gorgeous full-screen Multi-Touch books filled with interactive features, diagrams, photos, videos and more • Read a free sample of any book on the iBooks Store before making it a part of your permanent collection
	<p>https://itunes.apple.com/in/app/ibooks/id364709193?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device configured to render the	Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.

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Claim 1	Apple Accused Products (iBooks)
content; and	<p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is purchased from iBooks Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div style="border: 1px solid black; padding: 10px;"> <p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. </div> <p>http://support.apple.com/kb/ht4629</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that includes requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iBooks app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of iBooks App.</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="677 300 1755 1122" style="border: 1px solid black; padding: 10px;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce communication integrity. For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>client is a trusted entity.</p> <div data-bbox="671 306 1769 621" style="border: 1px solid black; padding: 10px;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p data-bbox="534 665 1431 698">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="608 731 1839 1286" style="border: 1px solid black; padding: 10px;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div> <p data-bbox="534 1323 1148 1356">http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce physical integrity.</p>

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Claim 1	Apple Accused Products (iBooks)
	For example, the content on device is protected using encryption, and the decryption keys are stored securely.

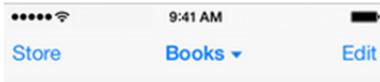
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)	
	<h2 data-bbox="819 241 1417 376">Encryption and Data Protection</h2> <p data-bbox="819 512 1628 719">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> <h3 data-bbox="819 773 1170 804">Hardware Security Features</h3> <p data-bbox="819 817 1613 904">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> <p data-bbox="819 917 1600 1041">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> <p data-bbox="819 1054 1634 1325">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> <p data-bbox="536 1367 1431 1398">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>	

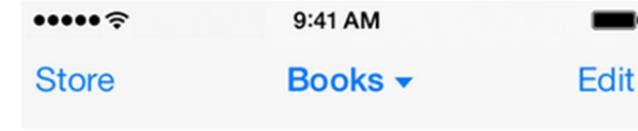
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>USE OF APP AND BOOK PRODUCTS AND THE APP AND BOOK SERVICES</p> <p>You agree that the App and Book Services and certain App and Book Products include security technology that limits your use of App and Book Products and that, whether or not App and Book Products are limited by security technology, you shall use App and Book Products in compliance with the applicable usage rules established by Apple and its principals ("Usage Rules"), and that any other use of the App and Book Products may constitute a copyright infringement. Any security technology is an inseparable part of the App and Book Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the App and Book Services by any means other than through software that is provided by Apple for accessing the App and Book Services. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the App and Book Services. Violations of system or network security may result in civil or criminal liability.</p> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iBooks Store) for access to the content.</p> <p>Further, when the user requests to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iBooks)
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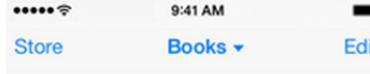
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)		
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p>		

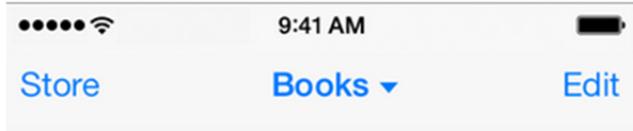
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. <p>http://support.apple.com/kb/ht4629</p>
wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. </div> <p>http://support.apple.com/kb/ht4629</p>

U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"><p>▼ Can iBooks read books aloud?</p><p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <hr/> <p>http://support.apple.com/kb/HT5557</p>

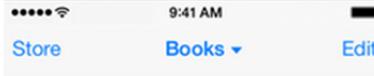
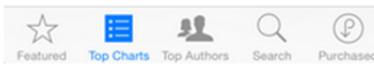
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> <p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

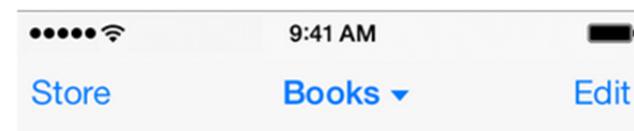
U.S. Patent No. 6,963,859

Claim 1	<p>Apple Accused Products (iBooks)</p> <h2>iOS: Configuring accessibility features</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>
the requester mode of operation is operative to request access to content from another distributed repository, and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iBooks Store) for access to the content.</p>

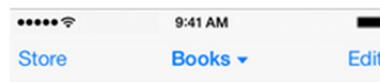
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
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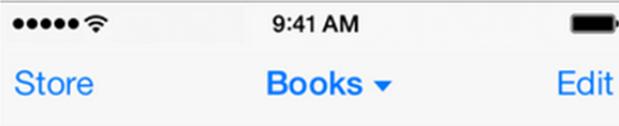
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
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said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p>

U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. </div>

U.S. Patent No. 6,963,859

Claim 1	<p>Apple Accused Products (iBooks)</p> <p>http://support.apple.com/kb/ht4629</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"><p>Books</p><p>Follow these steps to download purchased books:</p><ol style="list-style-type: none">1. Tap iBooks and tap Store.<ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download.</div> <p>http://support.apple.com/kb/HT2519</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"><p>▼ Can iBooks read books aloud?</p><p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <p>http://support.apple.com/kb/HT5557</p>
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U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> <p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 1	Apple Accused Products (iBooks)
	<p>iOS: Configuring accessibility features Languages <input type="button" value="Eng"/></p> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none">▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none">▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

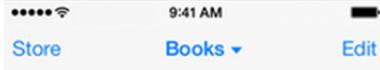
Claim 3	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p>

Claim 3	Apple Accused Products (iBooks)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 15	Apple Accused Products (iBooks)
A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iBooks App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered</p>

Claim 16	Apple Accused Products (iBooks)
program only in a manner specified by the usage rights.	<p>(e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.

<http://support.apple.com/kb/ht4629>

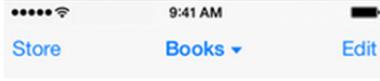
Claim 16	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store. <hr/> <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <p>http://support.apple.com/kb/HT2519</p> <p>▼ Can iBooks read books aloud?</p> <p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> <p>http://support.apple.com/kb/HT5557</p>

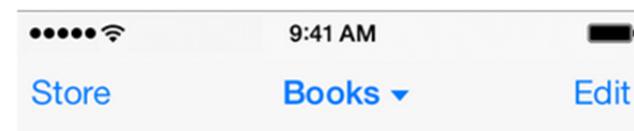
Claim 16	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> <p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 16	<p>Apple Accused Products (iBooks)</p> <h2>iOS: Configuring accessibility features</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>
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Claim 19	<p>Apple Accused Products (iBooks)</p> <p>A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.</p> <p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>
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Claim 19	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 19	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

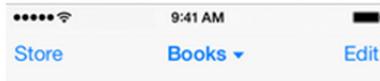
Claim 19	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div data-bbox="544 975 1024 1013" style="border: 1px solid #ccc; padding: 5px;"><p>▼ Can iBooks read books aloud?</p></div> <p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> <hr/> <p>http://support.apple.com/kb/HT5557</p>

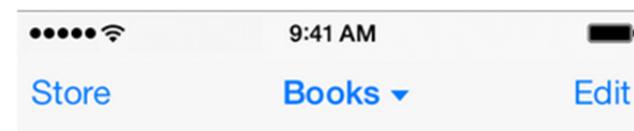
Claim 19	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p>
	<p>http://support.apple.com/kb/HT5557</p>

Claim 19	Apple Accused Products (iBooks)
	<p>iOS: Configuring accessibility features</p> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none">▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none">▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 20	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and</p>

Claim 20	Apple Accused Products (iBooks)
	<p>permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 20	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

Claim 20	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"><p>▼ Can iBooks read books aloud?</p><p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <hr/> <p>http://support.apple.com/kb/HT5557</p>

Claim 20	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p>
	<p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p>
<p>http://support.apple.com/kb/HT5557</p>	

Claim 20	Apple Accused Products (iBooks)
	<p>iOS: Configuring accessibility features Languages <input type="button" value="Eng"/></p> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none">▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none">▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 21	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.	<p>On information and belief, the Apple Accused Instrumentalities comprise a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

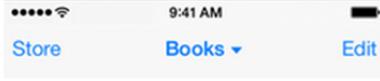
Claim 24	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.</p>	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (iBooks)
<p>A computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use</p>	<p>Apple's Accused Instrumentalities that support the iBooks application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content. (See below).⁴</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the iBooks Application</p>

⁴ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

Claim 58	<p>Apple Accused Products (iBooks)</p> <p>(“iBooks App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>
of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:	<p>Description</p> <p>iBooks is an amazing way to download and read books. iBooks includes the iBooks Store, where you can download the latest best-selling books or your favourite classics — day or night. Browse your library on a beautiful bookshelf, tap a book to open it, flip through pages with a swipe or a tap, and bookmark or add notes to your favourite passages.</p> <p>Download books</p> <ul style="list-style-type: none"> • Download best-sellers and classic books from the iBooks Store • Find fully illustrated books, including children's picture books, designed art books, photo books, cook books and more in the iBooks Store • Experience gorgeous full-screen Multi-Touch books filled with interactive features, diagrams, photos, videos and more • Read a free sample of any book on the iBooks Store before making it a part of your permanent collection
	<p>https://itunes.apple.com/in/app/ibooks/id364709193?mt=8</p> <p>ContentGuard’s investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple’s products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple’s argument concerning non-infringement.</p>
configuring a rendering device to render the content;	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is</p>

Claim 58	Apple Accused Products (iBooks)
	<p>purchased from iBooks Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div data-bbox="580 448 1900 1011" style="border: 1px solid black; padding: 10px;"><p>▼ Buying and downloading books on your computer</p><p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p><ul style="list-style-type: none">▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices.▪ Send it automatically from your computer to your iOS device.<p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p><ul style="list-style-type: none">▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store.▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store.</div> <p>http://support.apple.com/kb/ht4629</p>

Claim 58	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.
configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to a rendering device and configures to include a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iBooks app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed</p>

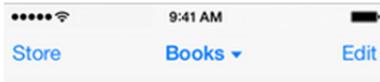
Claim 58	<p>Apple Accused Products (iBooks)</p>
	<p>using a digital certificate. The digital certificate is checked during installation and update of iBooks App. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="686 342 1763 1150" style="border: 1px solid black; padding: 10px;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce communication integrity. For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the</p>

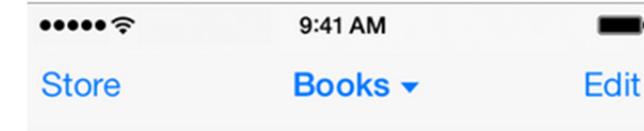
Claim 58	Apple Accused Products (iBooks)
	<p>client is a trusted entity.</p> <div data-bbox="671 306 1769 621" style="border: 1px solid black; padding: 10px;"><p>SSL, TLS</p><p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p></div> <p data-bbox="538 665 1425 698">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="608 731 1833 1286" style="border: 1px solid black; padding: 10px;"><p>7.4.2. Server Certificate</p><p>When this message will be sent:</p><p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p><p>Meaning of this message:</p><p>This message conveys the server's certificate chain to the client.</p><p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p></div> <p data-bbox="538 1323 1148 1356">http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce physical integrity.</p>

Claim 58	Apple Accused Products (iBooks)
	For example, the content on device is protected using encryption, and the decryption keys are stored securely.

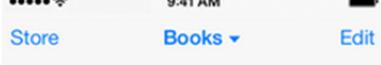
Claim 58	Apple Accused Products (iBooks)	
	<h2 data-bbox="823 241 1415 376">Encryption and Data Protection</h2> <p data-bbox="823 512 1626 719">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> <h3 data-bbox="823 773 1161 801">Hardware Security Features</h3> <p data-bbox="823 817 1605 902">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> <p data-bbox="823 918 1584 1037">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> <p data-bbox="823 1054 1626 1323">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> <p data-bbox="538 1372 1425 1400">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>	

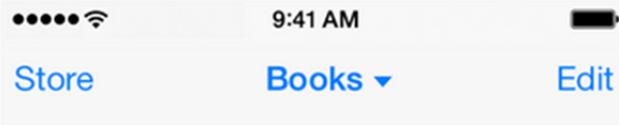
Claim 58	Apple Accused Products (iBooks)
	<p>USE OF APP AND BOOK PRODUCTS AND THE APP AND BOOK SERVICES</p> <p>You agree that the App and Book Services and certain App and Book Products include security technology that limits your use of App and Book Products and that, whether or not App and Book Products are limited by security technology, you shall use App and Book Products in compliance with the applicable usage rules established by Apple and its principals ("Usage Rules"), and that any other use of the App and Book Products may constitute a copyright infringement. Any security technology is an inseparable part of the App and Book Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the App and Book Services by any means other than through software that is provided by Apple for accessing the App and Book Services. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the App and Book Services. Violations of system or network security may result in civil or criminal liability.</p> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iBooks Store) for access to the content.</p> <p>Further, when the user requests to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

Claim 58	Apple Accused Products (iBooks)		
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p>		

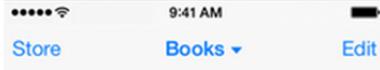
Claim 58	Apple Accused Products (iBooks)
	<p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. <p>http://support.apple.com/kb/ht4629</p>
enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which</p>

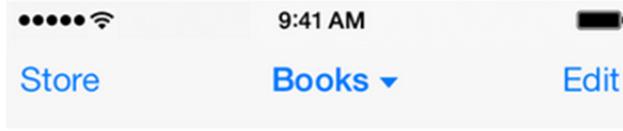
Claim 58	Apple Accused Products (iBooks)
	<p>maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="566 665 1883 1292" style="border: 1px solid black; padding: 10px;"><p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p><p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p><ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button. 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.</div> <p>http://support.apple.com/kb/ht4629</p>

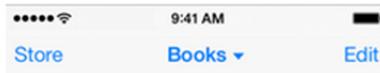
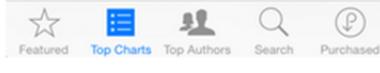
Claim 58	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <p>http://support.apple.com/kb/HT2519</p> <p>▼ Can iBooks read books aloud?</p> <p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> <p>http://support.apple.com/kb/HT5557</p>

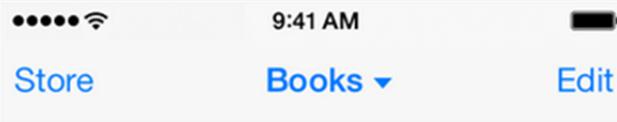
Claim 58	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 58	<p>Apple Accused Products (iBooks)</p> <h2>iOS: Configuring accessibility features</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iBooks Store) for access to the content.</p>

Claim 58	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

Claim 58	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none"> 1. Tap iBooks and tap Store.  <ol style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p>
receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p>

Claim 58	Apple Accused Products (iBooks)
	<p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="570 734 1879 1354" style="border: 1px solid black; padding: 10px;"><p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p><p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p><ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.<ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).<ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.</div>

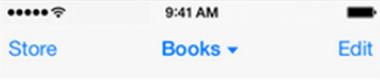
Claim 58	<p>Apple Accused Products (iBooks)</p> <p>http://support.apple.com/kb/ht4629</p> <p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <p>▼ Can iBooks read books aloud?</p> <p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> <hr/> <p>http://support.apple.com/kb/HT5557</p>
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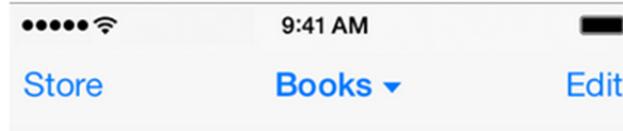
Claim 58	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p>
	<p>http://support.apple.com/kb/HT5557</p>

Claim 58	Apple Accused Products (iBooks)
	<p>iOS: Configuring accessibility features Languages Eng</p> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none">▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none">▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 60	Apple Accused Products (iBooks)
A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.	Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content. For example, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.

Claim 60	Apple Accused Products (iBooks)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>
Claim 62	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), it gets downloaded and stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). On information and belief, user can read the book unlimited number of times after it is stored in the Apple Accused Instrumentality's repository.</p> <p>Further, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

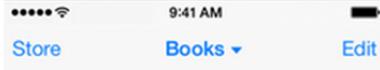
Claim 62	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

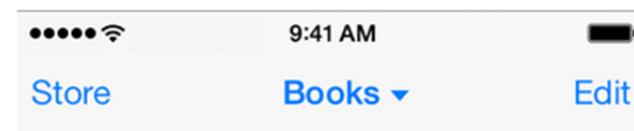
Claim 62	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none"> 1. Tap iBooks and tap Store.  <ol style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p>

Claim 71	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iBooks App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and</p>

Claim 71	Apple Accused Products (iBooks)
	reviewed by ContentGuard.

Claim 72	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book , the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 72	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

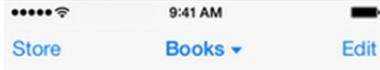
Claim 72	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"><p>▼ Can iBooks read books aloud?</p><p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <hr/> <p>http://support.apple.com/kb/HT5557</p>

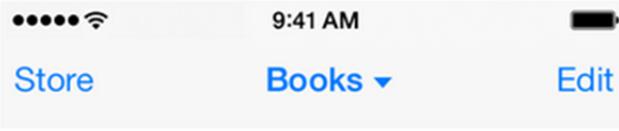
Claim 72	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> <p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 72	<p>Apple Accused Products (iBooks)</p> <h2>iOS: Configuring accessibility features</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p>
	<p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 75	<p>Apple Accused Products (iBooks)</p>
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>

Claim 75	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 75	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

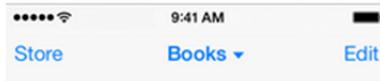
Claim 75	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"><p>▼ Can iBooks read books aloud?</p><p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <hr/> <p>http://support.apple.com/kb/HT5557</p>

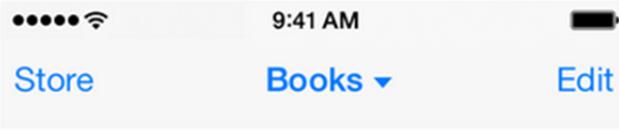
Claim 75	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 75	Apple Accused Products (iBooks)
	<p>iOS: Configuring accessibility features Languages <input type="button" value="Eng"/></p> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none">▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none">▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 76	Apple Accused Products (iBooks)
A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>

Claim 76	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 76	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

Claim 76	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none">1. Tap iBooks and tap Store.  <ol style="list-style-type: none">2. Scroll down and tap Purchased.3. Tap the book that you want to download. <hr/> <p>http://support.apple.com/kb/HT2519</p> <div data-bbox="544 975 1015 1013" style="border: 1px solid black; padding: 5px;"><p>▼ Can iBooks read books aloud?</p></div> <p>Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> <hr/> <p>http://support.apple.com/kb/HT5557</p>

Claim 76	Apple Accused Products (iBooks)
	<p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p>
	<p>http://support.apple.com/kb/PH14768</p> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p>

Claim 76	<p>Apple Accused Products (iBooks)</p> <h2>iOS: Configuring accessibility features</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p>VoiceOver</p> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p>Zoom</p> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p>Managing accessibility features using your device</p> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p>
	<p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p>

Claim 81	<p>Apple Accused Products (iBooks)</p>
<p>A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of</p>	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p>

Claim 81	Apple Accused Products (iBooks)
communicating with a master repository for obtaining an identification certificate for the repository.	Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.

SECTION 3: Apple Accused Products—Google Play Books

Claim 1	Apple Accused Products (Google Play Books)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content, said rendering system comprising:	<p>Apple’s Accused Instrumentalities that support the Google Play Books application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the “Apple Accused Instrumentalities”). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).⁵</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Google Play Books application (“Google Play Books App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

⁵ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

Claim 1	Apple Accused Products (Google Play Books)
	<p>Description</p> <p>With Google Play Books for iOS start reading today with millions of titles from Google Play on your iPhone, iPod touch, or iPad. Take your favorite books with you on the go and personalize your reading experience. Shop books in your browser on Google Play.</p> <p>Great Reading Experience</p> <ul style="list-style-type: none"> - Change font, search within the book, information about book - Manage your library (archive books after reading) - Night-reading mode - Read books offline - VoiceOver support <p>Discover Millions of Titles on Google Play</p> <ul style="list-style-type: none"> - Over 4 million books in every imaginable category, from the New York Times® bestsellers to favorite classics - Millions of free books available instantly - Free preview pages - Unlimited storage of books in the digital cloud - Worry-free archive <p>Syncs With Your Google Play books library</p> <ul style="list-style-type: none"> - Access all your books wirelessly from the digital cloud - Automatic page position syncing across devices -- pick up reading where you left off. <p>https://itunes.apple.com/us/app/google-play-books/id400989007?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p>

Claim 1	Apple Accused Products (Google Play Books)
	Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.
a rendering device configured to render the content; and	Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content. For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Google Play Books Store.

Claim 1	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p>

https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148

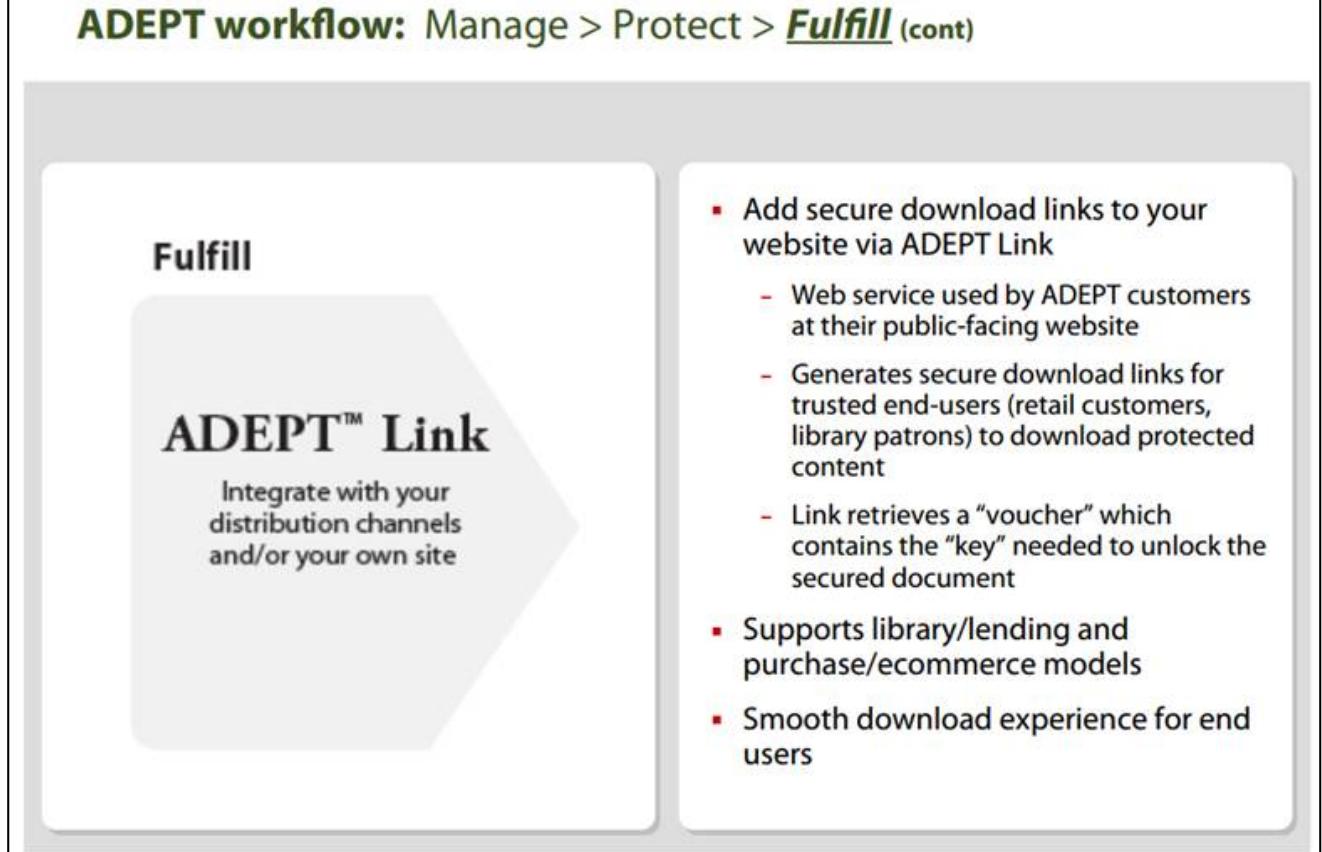
Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148

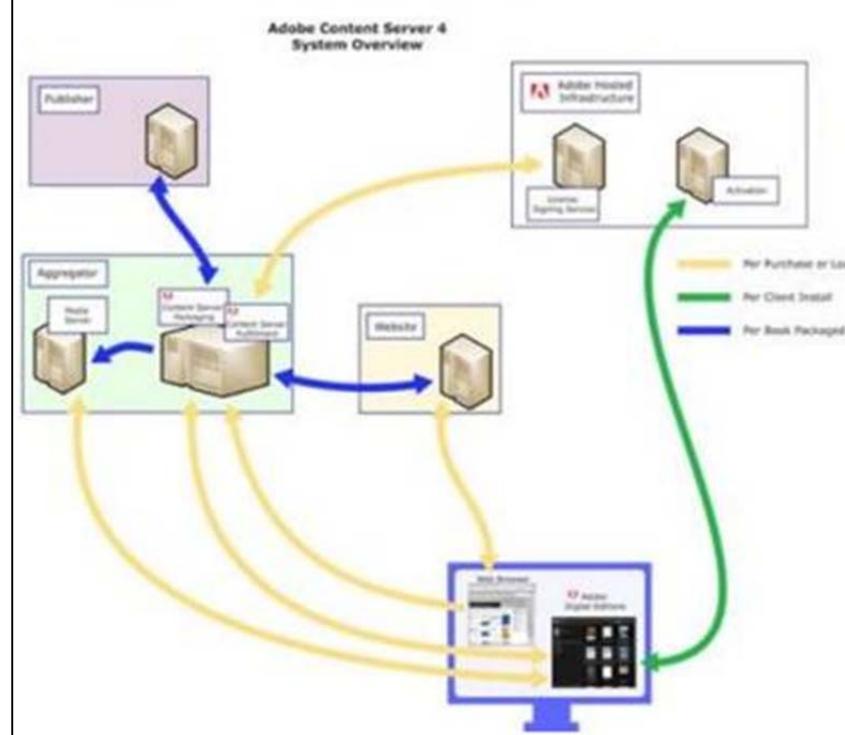
Claim 1	Apple Accused Products (Google Play Books)
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that includes requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Google Play Books app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of Google Play Books App. Upon information and belief, if the certificate is not present the installation/update fails.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce communication integrity.</p> <p>For example, DRM schemes such as Adobe DRM are used to generate secure download links for trusted end-users to download protected content.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Digital Rights Management (DRM) options for books on Google Play</p> <hr/> <p>The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p> <hr/> <p>You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p> <p>For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p> <p>https://support.google.com/books/partner/answer/3309439?hl=en</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>ADEPT workflow: Manage > Protect > <u>Fulfill</u> (cont)</p>  <ul style="list-style-type: none">▪ Add secure download links to your website via ADEPT Link<ul style="list-style-type: none">- Web service used by ADEPT customers at their public-facing website- Generates secure download links for trusted end-users (retail customers, library patrons) to download protected content- Link retrieves a "voucher" which contains the "key" needed to unlock the secured document▪ Supports library/lending and purchase/ecommerce models▪ Smooth download experience for end users <p>http://www.mobiteread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce physical integrity.</p> <p>For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p> <div data-bbox="614 344 1860 1046" style="border: 1px solid black; padding: 10px;"><h2 style="text-align: center;">Digital Rights Management (DRM) options for books on Google Play</h2><hr/><p>The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr/><p>You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p>For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p>https://support.google.com/books/partner/answer/3309439?hl=en</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>In the normal flow (see figure 7), the user visits the publisher or retailer web store to buy an e-book. After the purchase confirmation, he will receive an Adobe Content Server Message (.acsrm) file and by opening it with the Adobe Digital Editions, the software will communicate online with the Content Server that will encrypt the e-book and provides it DRM protected with the publisher's authorizations for the user based on his adobe ID. Before the user can read the e-book, he must also have registered his device. That way, the platform makes sure that the file owned by the user is not distributed further.</p>  <p>The diagram illustrates the Adobe Content Server 4 System Overview. It shows the flow of data from a Publisher to a User Device (e.g., iPhone, iPad, Kindle, Nook) through various components:</p> <ul style="list-style-type: none"> Publisher: Publishes content to the Aggregator. Aggregator: Manages rights and distributes content to the Content Server and the Webstore. Content Server: Manages rights and distributes content to the User Device. Adobe Hosted Infrastructure: Contains the Content Signing Service and Activation. Webstore: Manages rights and distributes content to the User Device. User Device: iPhone, iPad, Kindle, Nook. <p>Arrows indicate the flow of data and the type of communication:</p> <ul style="list-style-type: none"> Yellow arrows: Represent "Per Purchase or Loan" communication. Green arrow: Represent "Per Client Install" communication. Blue arrow: Represent "Per Book Purchase" communication. <p>Figure 7: Adobe Content Server Architecture (Copied from Adobe (2012) [31]).</p> <p>http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to download a previously</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Google Play Books Store) for access to the content.</p> <p>Further, when the user requests to read a previously downloaded book on an Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 1	Apple Accused Products (Google Play Books)
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>
the requester mode of	<p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> <p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted</p>

Claim 1	Apple Accused Products (Google Play Books)
operation is operative to request access to content from another distributed repository, and	<p>system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a previously purchased book (by tapping on the  download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (Google Play Books Store) for access to the content.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 1	Apple Accused Products (Google Play Books)
<p>said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p>

Claim 3	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 15	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, The Apple Accused Instrumentalities comprises a rendering device comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the Google Play Books App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (Google Play Books)
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Claim 16	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <p></p> <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 16	Apple Accused Products (Google Play Books)
	<h2 data-bbox="656 323 1459 388">Accessibility & text to speech</h2> <p data-bbox="656 442 1833 507">You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <h3 data-bbox="656 540 988 572">On your Android device</h3> <ol data-bbox="656 608 1723 825" style="list-style-type: none"><li data-bbox="656 608 1115 638">1. Go to your device's main Settings menu.<li data-bbox="656 646 1079 675">2. Under "System", select Accessibility.<li data-bbox="656 683 1051 713">3. Under "Services", touch TalkBack.<ul data-bbox="720 744 1723 773" style="list-style-type: none"><li data-bbox="720 744 1723 773">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.<li data-bbox="656 798 1227 825">4. Touch the On/Off selector to turn TalkBack on or off. <p data-bbox="656 861 1558 891">For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <div data-bbox="656 926 1115 964" data-label="Image"></div> <p data-bbox="656 1008 925 1041">On your iOS device</p> <ol data-bbox="656 1077 1241 1217" style="list-style-type: none"><li data-bbox="656 1077 1115 1106">1. Go to your device's main Settings menu.<li data-bbox="656 1114 1030 1144">2. Touch General > Accessibility.<li data-bbox="656 1152 903 1181">3. Select VoiceOver.<li data-bbox="656 1189 1241 1217">4. Touch the On/Off selector to turn VoiceOver on or off. <p data-bbox="656 1253 1617 1282">For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p> <p data-bbox="561 1344 1681 1380">https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p>

Claim 19	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (displayed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 19	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148

Claim 19	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087

Claim 20	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (played) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 20	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148

Claim 20	Apple Accused Products (Google Play Books)
	<h2 data-bbox="656 285 1459 350">Accessibility & text to speech</h2> <p data-bbox="656 404 1833 470">You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <h3 data-bbox="656 502 988 535">On your Android device</h3> <ol data-bbox="671 572 1723 789" style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul data-bbox="720 703 1723 731" style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p data-bbox="656 825 1558 850">For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p data-bbox="671 894 1115 922"> Read books aloud (flowing text format)</p> <h3 data-bbox="656 972 925 1005">On your iOS device</h3> <ol data-bbox="671 1042 1241 1181" style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p data-bbox="656 1214 1613 1238">For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087

Claim 21	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.	<p>On information and belief, the Apple Accused Instrumentalities comprises a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 24	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (Google Play Books)
A computer readable	Apple's Accused Instrumentalities that support the Google Play Books application are identified in

Claim 58	Apple Accused Products (Google Play Books)
<p>medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:</p>	<p>Exhibit 2 which includes corresponding documentation. (Collectively, the “Apple Accused Instrumentalities”). Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content. (See below).⁶</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Google Play Books application (“Google Play Books App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

⁶ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

Claim 58	Apple Accused Products (Google Play Books)
	<p>Description</p> <p>With Google Play Books for iOS start reading today with millions of titles from Google Play on your iPhone, iPod touch, or iPad. Take your favorite books with you on the go and personalize your reading experience. Shop books in your browser on Google Play.</p> <p>Great Reading Experience</p> <ul style="list-style-type: none"> - Change font, search within the book, information about book - Manage your library (archive books after reading) - Night-reading mode - Read books offline - VoiceOver support <p>Discover Millions of Titles on Google Play</p> <ul style="list-style-type: none"> - Over 4 million books in every imaginable category, from the New York Times® bestsellers to favorite classics - Millions of free books available instantly - Free preview pages - Unlimited storage of books in the digital cloud - Worry-free archive <p>Syncs With Your Google Play books library</p> <ul style="list-style-type: none"> - Access all your books wirelessly from the digital cloud - Automatic page position syncing across devices -- pick up reading where you left off. <p>https://itunes.apple.com/us/app/google-play-books/id400989007?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
configuring a rendering device to render the content;	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Google Play Books Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

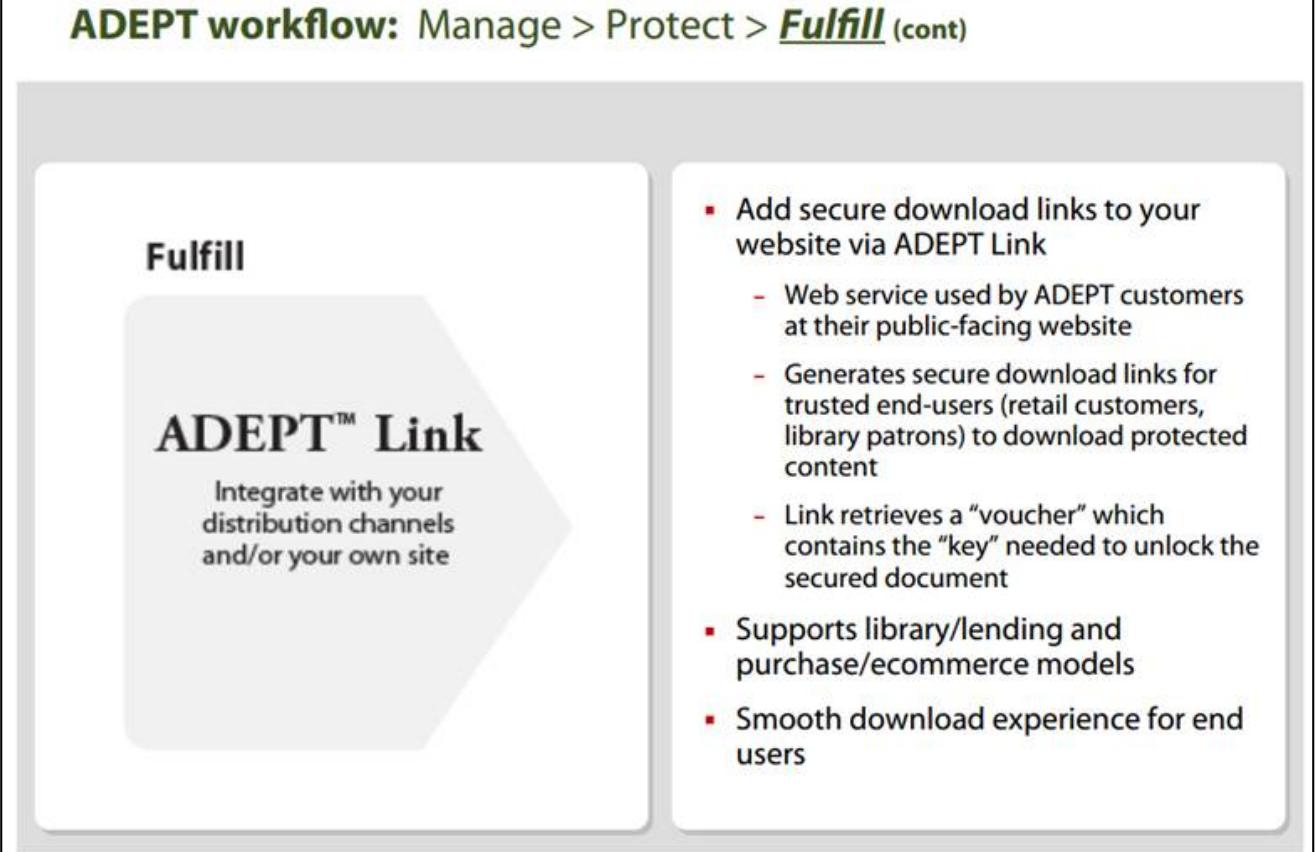
Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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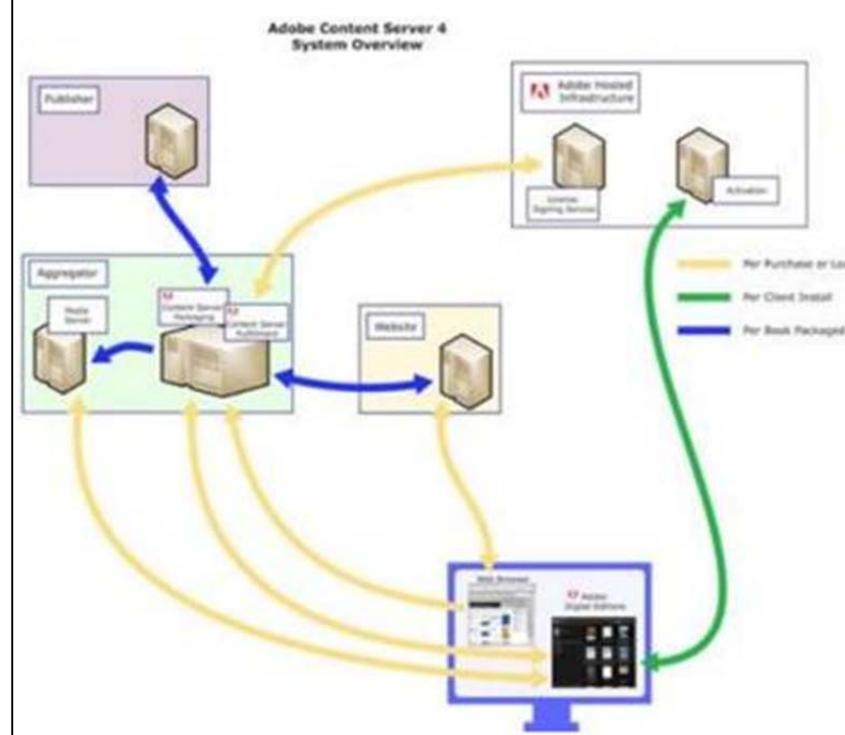
Claim 58	Apple Accused Products (Google Play Books)
configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to a rendering device and configures to include requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Google Play Books app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of Google Play Books App. Upon information and belief, if the certificate is not present the installation/update fails.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce communication integrity.</p> <p>For example, DRM schemes such as Adobe DRM are used to generate secure download links for trusted end-users to download protected content.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Digital Rights Management (DRM) options for books on Google Play</p> <hr/> <p>The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p> <hr/> <p>You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p> <p>For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p> <p>https://support.google.com/books/partner/answer/3309439?hl=en</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>ADEPT workflow: Manage > Protect > <u>Fulfill</u> (cont)</p>  <ul style="list-style-type: none">▪ Add secure download links to your website via ADEPT Link<ul style="list-style-type: none">- Web service used by ADEPT customers at their public-facing website- Generates secure download links for trusted end-users (retail customers, library patrons) to download protected content- Link retrieves a "voucher" which contains the "key" needed to unlock the secured document▪ Supports library/lending and purchase/ecommerce models▪ Smooth download experience for end users <p>http://www.mobiteread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce physical integrity.</p> <p>For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p> <div data-bbox="614 344 1860 1046" style="border: 1px solid black; padding: 10px;"><h2>Digital Rights Management (DRM) options for books on Google Play</h2><hr/><p>The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr/><p>You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p>For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p>https://support.google.com/books/partner/answer/3309439?hl=en</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>In the normal flow (see figure 7), the user visits the publisher or retailer web store to buy an e-book. After the purchase confirmation, he will receive an Adobe Content Server Message (.acsrm) file and by opening it with the Adobe Digital Editions, the software will communicate online with the Content Server that will encrypt the e-book and provides it DRM protected with the publisher's authorizations for the user based on his adobe ID. Before the user can read the e-book, he must also have registered his device. That way, the platform makes sure that the file owned by the user is not distributed further.</p>  <p>The diagram illustrates the Adobe Content Server 4 System Overview. It shows the flow of data between the Publisher, Aggregator, Adobe Content Server, Webstore, and User Device. The Publisher sends data to the Aggregator. The Aggregator interacts with the Adobe Content Server (which contains the Content Server API, Adobe Digital Editions, and Content Server Database). The Adobe Content Server also interacts with the Webstore. The User Device (containing the Adobe Digital Editions and Adobe Access Digital Editions) receives data from the Adobe Content Server. A legend indicates three types of data flow: Per Purchase or Loan (yellow arrow), Per Client Install (green arrow), and Per Book Purchase (blue arrow).</p> <p><i>Figure 7: Adobe Content Server Architecture (Copied from Adobe (2012) [31]).</i></p> <p>http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to download a previously</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Google Play Books Store) for access to the content.</p> <p>Further, when the user requests to read a previously downloaded book on an Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 58	Apple Accused Products (Google Play Books)
<p>enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 58	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

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Claim 58	Apple Accused Products (Google Play Books)
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a previously purchased book (by tapping on the  download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (Google Play Books Store) for access to the content.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Read books on your iPhone, iPad, & iPod Touch</p> <p> Some Google Play products and features aren't available in all countries. See what's available in your country</p> <p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p> <p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p> <p>Download Google Play Books for iOS</p> <p>Add books to your library</p> <p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p> <p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p> <p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 58	Apple Accused Products (Google Play Books)
<p>receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 58	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

Claim 60	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 62	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user attempts to download a previously purchased book (by tapping on the download icon displayed on the Apple Accused Instrumentality), it gets downloaded and stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). User can read the book unlimited number of times after it is stored in the Apple Accused Instrumentality's repository.</p> <p>Further, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p>

Claim 62	Apple Accused Products (Google Play Books)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 62	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 71	Apple Accused Products (Google Play Books)
A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, The Apple Accused Instrumentalities comprises a rendering device comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the Google Play Books App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 72	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book , the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple</p>

Claim 72	Apple Accused Products (Google Play Books)
	<p>Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 72	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 72	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <h3>On your Android device</h3> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <h3>On your iOS device</h3> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

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Claim 75	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (displayed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 75	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

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Claim 75	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

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Claim 76	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (played) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 76	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p>  <ol style="list-style-type: none">1. Open Safari.2. Go to Google Play ↗.3. Touch the  (iOS 6)  (iOS 7) Share icon.4. Select Add to home screen. <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none">• To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p>

https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148

Claim 76	Apple Accused Products (Google Play Books)
	<h2>Accessibility & text to speech</h2> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> <p>On your Android device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<ul style="list-style-type: none">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play.4. Touch the On/Off selector to turn TalkBack on or off. <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> <p> Read books aloud (flowing text format)</p> <p>On your iOS device</p> <ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off. <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site.</p>

https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087

Claim 81	Apple Accused Products (Google Play Books)
A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

SECTION 4: Apple Accused Products—Amazon Kindle

Claim 1	Apple Accused Products (Amazon Kindle)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage	<p>Apple's Accused Instrumentalities that support the Amazon Kindle application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).⁷</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Amazon Kindle Application ("Amazon Kindle App"), which is available on any device that has an iOS operating system.</p>

⁷ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

Claim 1	Apple Accused Products (Amazon Kindle)
rights associated with the content, said rendering system comprising:	<p>Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p> <div data-bbox="572 306 1902 600" style="border: 1px solid black; padding: 10px;"> <p>Description</p> <p>The Kindle app is optimized for the iPad, iPhone, and iPod touch, giving users the ability to read Kindle books, newspapers, magazines, textbooks and PDFs on a beautiful, easy-to-use interface. You'll have access to over 1,000,000* books in the Kindle Store plus hundreds* of newspapers and magazines. Amazon Whispersync automatically syncs your last page read, bookmarks, notes, and highlights across devices (including Kindle), so you can pick up your book where you left off on another device.</p> </div> <p>https://itunes.apple.com/us/app/kindle-read-books-ebooks-magazines/id302584613?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device configured to render the content; and	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Amazon Kindle Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<h2>Register Kindle for iPhone, iPad, and iPod touch</h2> <p>To buy and read Kindle content, you'll need to register the Kindle reading app to your Amazon account.</p> <hr/> <p>To register, make sure your device is connected to a wireless or data network.</p> <ol style="list-style-type: none">1. From your device, tap the Kindle app icon. <div data-bbox="1115 665 1389 926" style="border: 1px solid black; padding: 10px; text-align: center;"> Kindle</div> <ol style="list-style-type: none">2. Enter your Amazon account e-mail address and password.3. Tap Sign In. <p>Your Kindle content appears under the Cloud tab.</p> <p>Note: To view or change your registration, tap the Settings  icon on the app Home screen.</p> <p>http://www.amazon.com/gp/help/customer/display.html?nodeId=201244850</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Deliver to Kindle for iPad, iPhone, and iPod touch</p> <p>Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p> <hr/> <p>To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p> <p>After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p> <ol style="list-style-type: none"> 1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS. 2. From the Actions drop-down, select Deliver to my. 3. Select your iPhone, iPad, or iPod touch from the Deliver to my drop-down, and then select Deliver. 4. From the Kindle reading app Home screen, tap the Device tab to view and open the title.
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p> <p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that coupled to a rendering device and including a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Amazon Kindle app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce behavioral integrity.</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>For example, to enforce behavioral integrity, Apple installs Built-In apps in the controlled, secure environment of their own factory. Upon upgrade and/or installation, Apple requires all apps (even Built-In apps) to be signed using a certificate to enforce behavioral integrity. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="840 453 1628 1019" style="border: 1px solid black; padding: 10px;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce communication integrity.</p> <p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> <p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce physical integrity. For example, the device stores books as AZW or MOBI files. Both of these file formats provide the file with encryption to prevent the unauthorized access of the protected content. On information and belief, the Amazon Kindle app keeps the encryption keys stored in a secure location.</p>

Claim 1	Apple Accused Products (Amazon Kindle)	
	<p>MOBI</p> <p>The Mobipocket ebook format is another open standard for eBook publishing. It was bought by Amazon. It is also cross-platform. eBooks in this format can have the .prc or .mobi extension.</p> <p>MOBI formats can take complex content, include advanced navigation controls, supports indexing and a high degree of compression. For instance, readers can add their own pages, freehand drawings, annotations, highlights, bookmarks, corrections, and notes if devices support it. It can also include a dictionary. MOBI formats are suited for smaller screens because the image size limitation of 64K. The image size and image format (GIF) puts the format at odds with larger display devices like tablets.</p> <p>MOBI can also display reflowable content and fixed width layout.</p> <p>AZW</p> <p>AZW is a proprietary format developed by Amazon specifically for the Kindle eBook reader. It has its roots in the MOBI format but has <i>better compression and encryption</i> apart from a few more changes. The AZW format has found its place in many platforms with Kindle reading apps apart from Kindle. But AZW files can only be obtained from the Amazon online bookstore.</p> <p>AZW format is DRM (Digital Rights Management) restricted and is locked to the device id which is registered automatically with the user account of the Kindle purchaser. But DRM free books also carry the AZW extension but they are really no different from MOBI files.</p>	

<http://www.guidingtech.com/9661/difference-between-epub-mobi-azw-pdf-ebook-formats/>

For example, when the user attempts to use an Apple Accused Instrumentality to download a previously purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Amazon Kindle Store) for access to the content.</p> <p>Further, when the user requests to view a previously downloaded book (by tapping on “Device” icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality’s distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Buy & Download from Kindle for iPad, iPhone, and iPod touch</p> <p>Although you can't shop for Kindle content directly from the Kindle reading app, you can shop from the Kindle Store using the Safari browser and deliver Kindle titles to the Kindle reading app on your iPad, iPhone, or iPod touch.</p> <hr/> <p>Your device must be connected to a wireless or data network in order to download Kindle content to your Kindle reading app.</p> <ol style="list-style-type: none">1. From the Safari browser, visit the Kindle Store website:<ul style="list-style-type: none">◦ iPad: Kindle Store for iPad◦ iPhone or iPod Touch: Kindle Store for iPhone or iPod Touch2. Sign in to the Kindle Store with the same Amazon account you used when you registered the Kindle reading app.3. Browse for Kindle titles you want to read, and then tap to view the product detail page.4. To buy a Kindle title: tap Buy Now with 1-Click.<ul style="list-style-type: none">◦ To buy a book or one issue of a magazine or newspaper, tap Buy Now with 1-Click.◦ To subscribe to a periodical, tap Subscribe now.5. Click Read now to open the book in your Kindle app. <p>After you purchase content, your titles are delivered to the Kindle app on your iPad, iPhone, or iPod touch.</p>

<http://www.amazon.com/gp/help/customer/display.html?nodeId=201244870>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Deliver to Kindle for iPad, iPhone, and iPod touch</p> <p>Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p> <hr/> <p>To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p> <p>After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p> <ol style="list-style-type: none">1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS.2. From the Actions drop-down, select Deliver to my...3. Select your iPhone, iPad, or iPod touch from the Deliver to my drop-down, and then select Deliver.4. From the Kindle reading app Home screen, tap the Device tab to view and open the title. <p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Read Books</p> <p>You can turn pages, add bookmarks or notes, and highlight text while you are reading Kindle books, just like with print books.</p> <ul style="list-style-type: none"> • View books - From the Kindle reading app Home screen, tap the Menu  icon, tap Books, and then tap a title to open it. <ul style="list-style-type: none"> ◦ Tap Cloud to access books that aren't downloaded to your device. Tap the book to it add it to your device. <p>http://www.amazon.com/gp/help/customer/display.html?nodeId=201244920</p>
wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book (by tapping on “Device” icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality’s distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and determines if the requested manner of use is in accordance with the usage rights and permits the rendering accordingly.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality’s repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech /X-ray permissions associated with the book. Based on this information, the Apple Accused Instrumentality’s repository (implemented as a trusted system which maintains physical integrity, communications</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech/X-Ray feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <p>Deliver to Kindle for iPad, iPhone, and iPod touch</p> <p>Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p> <hr/> <p>To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p> <p>After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p> <ol style="list-style-type: none">1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS.2. From the Actions drop-down, select Deliver to my...3. Select your iPhone, iPad, or iPod touch from the Deliver to my... drop-down, and then select Deliver.4. From the Kindle reading app Home screen, tap the Device tab to view and open the title. <p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Product Details</p> <p>File Size: 447 KB Print Length: 276 pages Page Numbers Source ISBN: 0140086838 Publisher: Penguin Classic; Anniversary edition (December 26, 2006) Sold by: Amazon Digital Services, Inc. Language: English ASIN: B000SEFBJ8 Text-to-Speech: Enabled <input checked="" type="checkbox"/></p> <p>X-Ray: Not Enabled</p> <p>Lending: Not Enabled</p> <p>Amazon Best Seller Rank: #2 in Kindle Store (See Top 100 Paid in Kindle Store) #12 in Kindle Store > Kindle eBooks > Literature & Fiction > United States > Native American Studies #13 in Books > Politics & Social Sciences > Social Sciences > Specific Demographics > Native American Studies</p> <p>http://www.amazon.com/Ceremony-Penguin-Classics-Deluxe-Edition-ebook/dp/B000SEFBJ8/ref=pd_sim_kstore_6?ie=UTF8&refRID=1PJXTCS2TKEQKV5FQ81N</p> <p>Product Details</p> <p>File Size: 447 KB Print Length: 276 pages Page Numbers Source ISBN: 0140086838 Publisher: Penguin Classic; Anniversary edition (December 26, 2006) Sold by: Amazon Digital Services, Inc. Language: English ASIN: B000SEFBJ8 Text-to-Speech: Enabled <input checked="" type="checkbox"/></p> <p>X-Ray: Not Enabled <input checked="" type="checkbox"/></p> <p>Lending: Not Enabled</p> <p>Amazon Best Seller Rank: #2 in Kindle Store (See Top 100 Paid in Kindle Store) #12 in Kindle Store > Kindle eBooks > Literature & Fiction > United States > Native American Studies #13 in Books > Politics & Social Sciences > Social Sciences > Specific Demographics > Native American Studies</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>http://www.amazon.com/Ceremony-Penguin-Classics-Deluxe-Edition-ebook/dp/B000SEFBJ8/ref=pd_sim_kstore_6?ie=UTF8&refRID=1PJXTCS2TKEQKV5FQ81N</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"><p>Product Details</p><p>File Size: 302 KB Print Length: 291 pages Page Numbers Source ISBN: 0452280621 Publisher: Vintage; Reprint edition (July 24, 2007) Language: English ASIN: B000TWUTYG Text-to-Speech: Not enabled <input checked="" type="checkbox"/> The publisher has requested not to enable Text-to-Speech for this title.</p><p>X-Ray: Enabled <input checked="" type="checkbox"/></p><p>Lending: Not Enabled</p><p>Amazon Best Seller Rank: #7 in Kindle Store > Kindle eBooks > Literature & Fiction > Literary Fiction > African American #59 in Kindle Store > Kindle eBooks > Literature & Fiction > African American #66 in Books > Literature & Fiction > United States > African American</p><p>Store (See Top 100 Paid in Kindle Store)</p></div> <p>http://www.amazon.com/Beloved-Toni-Morrison-ebook/dp/B000TWUTYG</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Product Details</p> <p>File Size: 302 KB Print Length: 291 pages Page Numbers Source ISBN: 0452280621 Publisher: Vintage; Reprint edition (July 24, 2007) Language: English ASIN: B000TWUTYG Text-to-Speech: Not enabled <input checked="" type="checkbox"/> X-Ray: Enabled <input checked="" type="checkbox"/></p> <p>Lending</p> <p>Amazon</p> <p># #5 #6</p> <div data-bbox="665 652 1108 775"> <p>X-Ray is available on all Kindle Touch, Kindle Paperwhite, Kindle Fire HD, the latest generation Kindle Fire, and the Kindle iOS Reader app.</p> </div> <p>in Kindle Store (See Top 100 Paid in Kindle Store) s > Literature & Fiction > Literary Fiction > African American s > Literature & Fiction > African American > United States > African American</p> <p>Would you like to give feedback on images or tell us about a lower price?</p>